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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

L-01527

MAY 28 1998

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REPLY TO THE ATTENTION OF:

MAY 28 1998

Mr. Johnny W. Reising
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

SRF-5J

RE: A2,P1 Revised IRDP

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) responses to comments and revised Integrated Remedial Design (IRDP) package for Area 2, Phase I (A2,P1).

Overall, the revised IRDP addressed the majority of U.S. EPA's previous comments. However, information pertaining to recent sampling in the firing range and the above waste acceptance criteria area in the Inactive Flyash Pile was not submitted in the revised IRDP. This information must be formally submitted and incorporated into the document. U.S. EPA's remaining comments focus on the implementation plan and are attached.

Therefore, U.S. EPA disapproves the revised A2,P1 document pending receipt of further information on the recent sampling events and adequate responses to the attached comments. U.S. DOE must submit a revised IRDP along with responses to comments within thirty (30) days receipt of this letter.

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Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

James A. Saric
Remedial Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO
Bill Murphie, U.S. DOE-HDQ
John Bradburne, FERMCO
Terry Hagen, FERMCO
Tom Walsh, FERMCO

TECHNICAL REVIEW COMMENTS ON "AREA 2, PHASE I SOUTHERN WASTE UNITS IMPLEMENTATION PLAN FOR OPERABLE UNIT 2"

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

GENERAL COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Appendix #: D Page #: NA Line #: NA
Original General Comment #: 1
Comment: This appendix has been completely rewritten and includes new material. Therefore, the appendix was reviewed as an original rather than revised submittal. Original General Comment 2 and Original Specific Comments 3 through 6 pertain to Appendix D and should be addressed.

Commenting Organization: U.S. EPA Commentor: Saric
Appendix #: D Page #: Not applicable (NA) Line #: NA
Original General Comment #: 2
Comment: The text states that analytical results and an updated contour map based on the results of additional sampling in and around the firing range will be forwarded to the regulatory agencies under separate cover as they become available. As a result of discussions between U.S. Department of Energy (DOE), U.S. Environmental Protection Agency (U.S. EPA), and Ohio Environmental Protection Agency personnel at an April 7, 1998, meeting, DOE proposed additional soil sampling in the above-waste acceptance criteria (WAC) area in the Inactive Flyash Pile to further define the extent of the above-WAC area. The analytical results from the additional sampling in the above-WAC area and the associated revised figures should also be forwarded to the regulatory agencies for review as soon as they become available.

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.4.3 Page #: 2-7 Line #: 18 through 22
Original Specific Comment #: 1
Comment: The text states that about 323,000 cubic yards of impacted material and an additional 80,000 cubic yards of fill material will be disposed of in the On-Site Disposal Facility (OSDF) after WAC attainment is demonstrated. However, the executive summary states that about 342,000 cubic yards of impacted material will be disposed of in the OSDF. This apparent discrepancy in volume of material to be

3

disposed of in the OSDF should be resolved and the implementation plan revised accordingly.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 3.3.2.2 Page #: 3-15 Line #: 20 to 21
Original Specific Comment #: 2
Comment: Original Specific Comment 4 of U.S. EPA's January 1998 comments on the draft Integrated Remedial Design Package for Area 2, Phase I note the high degree of uncertainty associated with the location (depth below ground surface) of the boundary between the overburden and the material in the Inactive Flyash Pile that exceeds WAC for the OSDF. The text of the implementation plan states that overburden with levels of contamination below OSDF WAC will be excavated to the top of the above-WAC material at elevation 558. As discussed at the April 7, 1998, meeting, the text should be revised to state that overburden near the top of the above-WAC material will be excavated using shallow lifts not exceeding 1 foot and screened for radiological contamination beginning at elevation 560. This approach is required to minimize placement of above-WAC material in the OSDF. Also, the excavation contractor should be required to follow this approach.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: D.1.0 Page #: D-1 Line #: 21
Original Specific Comment #: 3
Comment: The text states that the numerous color figures included in Appendix D are posted on the Internet at "www.ead.anl.gov/~femp/frp;" however, this web site reads "Page Not Found. The page you requested has been moved, deleted or doesn't exist." The alternative web site, "www.ead.anl.gov/~fernald/html/area2phaseI.html," contains some but not all of the figures and has not been updated recently. DOE should ensure that the uniform resource locator (URL) cited in the text is accessible or should transfer all the most recent figures to the accessible URL. The text should then be revised as necessary.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: D.1.1.3 Page #: D-7 Line #: 30
Original Specific Comment #: 4
Comment: The text states that the maximum total uranium measurement in Table D-6 is 270 parts per million (ppm). However, the table includes a maximum total uranium measurement of 359.7 milligrams per kilogram. Also, the text states that Table D-6 identifies the types of "special materials" encountered, but no such information appears in the table and the "special materials" are not obvious in the photographs. The text and Table D-6 should be revised as necessary to be consistent.

4

Commenting Organization: U.S. EPA Commentor: Saric
Section #: D.1.2.2 Page #: D-11 Line #: 12
Original Specific Comment #: 5
Comment: The text states that the scatter plot in Figure D37 shows a "very strong correlation." This statement should be supported with a correlation coefficient. The term "very strong correlation" implies a coefficient well over 0.9, but the Figure D37 does not appear to support such a high coefficient.

Commenting Organization: U.S. EPA Commentor: Saric
Figure #: D6 Page #: NA Line #: NA
Original Specific Comment #: 6
Comment: This figure shows maximum total uranium concentrations using colored circles. However, similar hues of yellow are used for the three intermediate concentration ranges, so it is difficult to distinguish 10 ppm of total uranium from 1,000 ppm. The different (white and a yellowish tan) backgrounds in the figure further complicate its interpretation. This comment also applies to Figures D7 through D21, D32 through D36, D38, and D50 through D53, although the difficulties with some of these figures are mitigated by labels giving the actual analytical results. For future submittals, DOE should use a wider color palette, different shapes for different categories, or both techniques to improve the usability of figures.

5